

Response Form

Market-Wide Half-Hourly Settlement (MHHS)

Consultation on Programme Implementation

Principles

The deadline for responses is 5 March 2021. Please send this form to HalfHourlySettlement@ofgem.gov.uk once completed.

Organisation: IMServ

Contact: Paul Akrill, Business Development Director paul.akrill@imserv.com

Is your feedback confidential? NO ☒ YES ☐

Unless you mark your response confidential, we will publish it on our website, www.ofgem.gov.uk, and put it in our library. You can ask us to keep your response confidential, and we will respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004. If you want us to keep your response confidential, you should clearly mark your response to that effect and include reasons.

If the information you give in your response contains personal data under General Data Protection Regulation (EU) 2016/679 and Data Protection Act 2018, the Gas and Electricity Markets Authority will be the data controller. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. If you are including any confidential material in your response, please put it in the appendices.

Challenges and Risks

1. Do you agree with the challenges and risks that we have identified? Are there any other challenges or risks from the implementation approach described in this document that you would like to bring to our attention? If so can you suggest any appropriate solutions or mitigations?

Implementing MHHS is a huge and expensive undertaking, and has all the hallmarks of being the type of programme that causes the industry problems with timely and on-target delivery.

It is therefore critical to achieving the best possible outcome, balancing the cost and speed elements, that best-in-class programme management techniques are used to engage with all affected elements of the industry, bringing clarity and co-ordination so that we can all move together to a successful implementation.

IMServ has concerns whilst ELEXON is a very able BSC code manager, with deep domain expertise, they are not a wide-view, cross-code programme manager with deep expertise in this area. ELEXON have a very important role to play in the programme, but IMServ's *preference would be for Ofgem to appoint an independent programme manager* to manage these risks allowing ELEXON to focus on the things that it, and only it, needs to do and get right.

2. Do you support the solutions and mitigations proposed? Are there additional measures or mitigations that you would propose to make the programme implementation approach more robust and effective?

IMServ is sceptical that the solutions and mitigations will be effective:

- There is a limited resource pool of experts at ELEXON. Separating them across programme and service delivery functions will dilute that pool of key resource;
- An independent assurance function should be truly independent, as all parties should be treated equally from a programme perspective. If ELEXON as overall programme manager proceeds, then the independent assurance should be fully independent, appointed and paid for by a separate party.